

11/05/2022

CENTRAL DISTRICT OF CALIFORNIA
BY: jm DEPUTY

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18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 2:22-mj-04385 -duty

23 No. CR

24 Plaintiff,

25 GOVERNMENT'S EX PARTE APPLICATION
26 FOR ORDER SEALING CASE;
27 DECLARATION OF ALI MOGHADDAS

28 (UNDER SEAL)

CHRISTOPHER K. KAMON,

Defendant.

19 The government hereby applies ex parte for an order that the
20 above-captioned case and all documents filed in it be kept under seal
21 until further request and order of the Court in this matter.

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This ex parte application is based on the attached declaration of Ali Moghaddas.

Dated: November 5, 2022

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

/s/
SCOTT PAETTY
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UNITED STATES OF AMERICA

DECLARATION OF ALI MOGHADDAS

I, Ali Moghaddas, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of defendant CHRISTOPHER K. KAMON.

2. The government's investigation of defendant's co-schemers both in this matter, and parallel investigations, remains ongoing. There is reason to believe that disclosure of the government's criminal case against defendant will result in notice to defendant's co-schemers both related to this investigation and others. Such notice may result in the co-schemers' (1) flight from prosecution; (2) destruction of or tampering with evidence; or (3) otherwise seriously jeopardizing the government's investigations.

3. Moreover, there is a possibility that defendant will cooperate with the government in connection with the instant criminal matter and the parallel investigation into a broader scheme to defraud occurring by attorneys at his former employer, the now-defunct law firm Girardi/Keese. Such cooperation could entail making covert recordings of meetings and telephone calls. Thus, keeping defendant's criminal charges under seal for the time being, especially given the possibility of his cooperation, will ensure that his co-schemers will not attempt to flee or destroy evidence.

4. If defendant's docket was open to public examination with the exception of his cooperation plea agreement, as is typically done, most experienced criminal attorneys would be able to infer from the absence of a publicly filed plea agreement that defendant was cooperating with the government, which would undermine defendant's

ability to record prospective covert contacts with his co-conspirators and other criminals. This is especially true here where targets of the government's investigation are attorneys themselves.

5. Accordingly, to ensure that defendant's co-schemers do not flee and/or destroy evidence, and to enable defendant to provide covert cooperation should he choose to cooperate with the government, the government requests that the entire case docket and all documents filed therein be sealed and remain so until further order of the Court, upon the government's request.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on November 5, 2022.

/s/

ALI MOGHADDAS